

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

ELIANA VALDERRAMA and JUAN FELIPE  
VANEGAS, on behalf of themselves and all others  
similarly situated,

Plaintiffs,

Civil Case No. 1:24-cv-22772-JEM

vs.

CONMEBOL, CONFEDERACION SUDAMERICA  
DE FUTBOL, CONFEDERATION OF NORTH  
CENTRAL AMERICA AND CARRIBEAN  
ASSOCIATION FOOTBALL, et al.,

Defendants.

**DEFENDANTS' LOCAL RULE 3.8 NOTICE OF  
PENDING, REFILED, RELATED OR SIMILAR ACTIONS**

Pursuant to Southern District of Florida Local Rule 3.8 and Section 2.15.00 of the Court's Internal Operating Procedures, Defendants South Florida Stadium LLC ("SFS"), Ticketmaster L.L.C. ("Ticketmaster"), and Live Nation Entertainment, Inc. ("Live Nation," and together with SFS and Ticketmaster, "Defendants"), hereby give notice to the Court that there currently are pending other related or similar putative class actions arising out of the Copa America Final Match held at Hard Rock Stadium on July 14, 2024.

In providing this Notice, Defendants expressly reserve all rights with respect to asserting any and all defenses, including but not limited to moving to compel arbitration of claims asserted by a named plaintiff or absent member of a proposed class.

**APPLICABLE LOCAL RULES AND INTERNAL OPERATING PROCEDURES**

Defendants provide this Notice pursuant to the undersigned's "continuing duty to bring promptly to the attention of the Court and opposing counsel the existence of other actions or

proceedings as described in Section 2.15.00 of the Court's Internal Operating Procedures, as well as the existence of similar actions or proceedings then pending before another court." *See* S.D. Fla.

Local Rule 3.8.

Southern District of Florida Local Rule 3.8 provides:

It shall be the continuing duty of the attorneys of record in every action or proceeding to bring promptly to the attention of the Court and opposing counsel the existence of other actions or proceedings as described in Section 2.15.00 of the Court's Internal Operating Procedures, as well as the existence of any similar actions or proceedings then pending before another court or administrative agency. Such notice shall be given by filing with the Court and serving a "Notice of Pending, Refiled, Related or Similar Actions," containing a list and description thereof sufficient for identification.

Section 2.15.00 of the Court's Internal Operating Procedures, in turn, provides:

Whenever an action or proceeding is filed in the Court which involves subject matter which is a material part of the subject matter of another action or proceeding then pending before this Court, or for other reasons the disposition thereof would appear to entail the unnecessary duplication of judicial labor if heard by a different Judge, the Judges involved shall determine whether the higher-numbered action or proceeding shall be transferred to the Judge assigned to the lower-numbered action. (*See* IOP 2.06.00 Transfer of Higher-Numbered Cases).

Finally, Section 2.06.00 of the Court's Internal Operating Procedures provides, in relevant part:

Each division in the Southern District of Florida has its own series of numbers which are sequentially assigned to cases. Therefore, for the purpose of higher numbered transfers, the "lower-numbered" case refers to the earlier-filed case. The judge assigned the higher-numbered case shall prepare a proposed Order of Transfer and a Notice to the parties that the higher-numbered case is transferred to the docket of the judge having the lower-numbered case, effective upon that judge's consent to the transfer.

Defendants respectfully submit this Notice so that, in accordance with this Court's Local Rules and Internal Operating Procedures and in the interests of judicial economy, the Honorable Judges Bloom, Martinez, and Williams may consider transfer of the related federal putative class

action cases to the docket of Judge Bloom, who presides over the lowest-numbered, earliest-filed case in this District.

### **IDENTIFICATION OF RELATED OR SIMILAR CASES**

#### **A. FEDERAL COURT PUTATIVE CLASS ACTIONS**

- 1. *Nobel v. South Florida Stadium LLC et al.*, No. 1:24-cv-22751-BB (S.D. Fla.), filed July 19, 2024, and pending before the Honorable Beth Bloom.**

In the operative complaint (ECF 1), Plaintiff Nobel's claims are alleged to arise out of events that took place at the Copa America Final Match that was held at Hard Rock Stadium on July 14, 2024. *See, e.g.*, Compl. ¶¶ 1, 4. Plaintiff Nobel brings putative class claims for "Negligence," "Negligence Failure to Warn," and "Unjust Enrichment" against Defendants South Florida Stadium LLC d/b/a Hard Rock Stadium, Confederacion Sudamericana de Futbol d/b/a CONMEBOL, Confederation of North, Central America and Caribbean Association Football d/b/a CONCACAF, and Best Crowd Management, Inc. *See* Compl. at 4–6, 23–29.

Plaintiff Nobel seeks certification of a class consisting of: "All natural persons who purchased a ticket to the Copa America Final Match and were prohibited from entering Hard Rock Stadium." Compl. ¶ 88.

- 2. *Valderrama et al. v. CONMEBOL et al.*, No. 1:24-cv-22772-JEM (S.D. Fla.), filed July 19, 2024, and pending before the Honorable Jose E. Martinez.**

In the operative complaint (ECF 1), Plaintiffs' claims are alleged to arise out of events that took place at the Copa America Final Match that was held at Hard Rock Stadium on July 14, 2024. *See, e.g.*, Compl. ¶ 1. Plaintiffs bring putative class claims for "Negligent Misrepresentation Reliance," "Breach of Contract," "Breach of Implied Covenant of Good Faith and Fair Dealing," "Unjust Enrichment," "Violation of N.Y. GBL § 349," "Violation of Florida Deceptive and Unfair Trade Practices Act ('FDUPTA'), Fla. Stat. § 501.201 et seq.," and "Violation of New Jersey Consumer Fraud Act, N.J.S.A., 56:8-1 et seq." against Defendants CONMEBOL, Confederacion

Sudamericana de Futbol, Confederation of North, Central America and Caribbean Association Football, Hard Rock Stadium LLC,<sup>1</sup> South Florida Stadium LLC, Ticketmaster L.L.C., Live Nation Entertainment, Inc. and John Does No. 1–10. *See* Compl. at 3–5, 14–19.

Plaintiffs seek certification of a classes consisting of:

- “**National Class:** All persons who purchased tickets to the Final and were denied entry to the Final for all claims except New York and New Jersey consumer laws.”
- “**New York Subclass:** All persons in the State of New York who purchased tickets to the Final in the State of New York and were denied entry to the Final.”
- “**New Jersey Subclass:** All persons in the State of New Jersey who purchased tickets to the Final in the State of New Jersey and were denied entry to the Final.”

Compl. ¶ 55.

3. ***Pou v. CONMEBOL et al.*, No. 1:24-cv-22828-KMW (S.D. Fla.), filed July 24, 2024, and pending before the Honorable Kathleen M. Williams.**

In the operative complaint (ECF 1), Plaintiff Pou’s claims arise out of allegations concerning events that took place at the Copa America Final Match that was held at Hard Rock Stadium on July 14, 2024. *See, e.g.*, Compl. ¶¶ 24, 36–54. Plaintiff Pou brings putative class claims for “Breach of Contract” and “Unjust Enrichment” against Defendants CONMEBOL and CONCACAF, “Negligence” against Defendants CONMEBOL, CONCACAF, Miami Dolphins, Ltd., and South Florida Stadium LLC, and “Declaratory Judgment” against Defendants CONMEBOL and CONCACAF. *See* Compl. at 11–26.

Plaintiff Pou seeks certification of a class consisting of: “All persons who, for purposes other than resale, purchased from Defendants, their agents, or their associates during the Class Period (February 28, 2024, to July 14, 2024) a ticket to watch the Copa America USA Final Match

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<sup>1</sup> The undersigned is not aware of any such legal entity.

on July 14, 2024, at Hard Rock Stadium but where [sic] later denied entry into the Hard Rock Stadium.” Compl. ¶ 57.

## **B. STATE COURT PUTATIVE CLASS ACTIONS**

- 1. *Martinez et al. v. South Florida Stadium LLC et al.*, No. 2024-013325-CA-01 (Fla. 11th Cir. Ct.), filed July 17, 2024, and pending before the Honorable Fajardo Orshan.**

In the operative complaint (DE 10), Plaintiffs’ claims are alleged to arise out of events that took place at the Copa America Final Match that was held at Hard Rock Stadium on July 14, 2024. *See, e.g.*, Compl. ¶¶ 1, 4. Plaintiffs bring putative class claims for “Negligence” and “Unjust Enrichment” against Defendants South Florida Stadium LLC d/b/a Hard Rock Stadium, Confederacion Sudamericana de Futbol d/b/a CONMEBOL, Confederation of North, Central America and Caribbean Association Football d/b/a CONCACAF, and Best Crowd Management, Inc. *See* Compl. at 4–6, 22–27.

Plaintiffs seek certification of a class consisting of: “All residents of the United States who (1) purchased one or more tickets to the Copa America final on July 14, 2024 and (2) were denied entry to Hard Rock Stadium.” Compl. ¶ 89.

- 2. *Manco v. South Florida Stadium LLC*, No. 2024-013421-CA-01 (Fla. 11th Cir. Ct.), filed July 18, 2024, and pending before the Honorable Tanya Brinkley.**

In the operative complaint (DE 2), Plaintiff’s claims are alleged to arise out of events that took place at the Copa America Final Match that was held at Hard Rock Stadium on July 14, 2024. *See, e.g.*, Compl. ¶ 1. Plaintiff brings putative class claims against Defendant South Florida Stadium LLC for “Negligence.” *See* Compl. at 7–9.

Plaintiff seeks certification of a class consisting of: “All ticketholders denied access to the Copa America final on July 14, 2024.” Compl. ¶ 30.

3. ***Garn v. South Florida Stadium LLC et al.*, No. 2024-013999-CA-01 (Fla. 11th Cir. Ct.), filed July 19, 2024, and pending before the Honorable Lisa Walsh.**

In the operative complaint (DE 2), Plaintiff Garn’s claims are alleged to arise out of events that took place at the Copa America Final Match that was held at Hard Rock Stadium on July 14, 2024. *See, e.g.*, Compl. ¶¶ 12, 14. Plaintiff Garn brings putative class claims for “Violation of Florida Deceptive and Unfair Trade Practices Act,” “Unjust Enrichment,” “Breach of Contract,” and “Negligence” against Defendants South Florida Stadium LLC d/b/a Hard Rock Stadium, Confederacion Sudamericana de Futbol d/b/a CONMEBOL, and Confederation of North, Central America and Caribbean Association Football d/b/a CONCACAF. *See* Compl. at 1–2, 8–11.

Plaintiff Garn seeks certification of a class consisting of: “[A]ll persons who purchased valid tickets to the Championship and who attended or presented themselves at the Venue for the Championship.” Compl. ¶ 27.

Dated: August 19, 2024

Respectfully submitted,

By: /s/ Melissa C. Pallett-Vasquez

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Stadium LLC, Ticketmaster L.L.C., and Live  
Nation Entertainment, Inc.*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on August 19, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Melissa C. Pallett-Vasquez  
Melissa C. Pallett-Vasquez